IN THE UNITED STATES DISTRICT COURT FILED ORIGINAL FILED ORIGINAL SEP 18 2013

UNITED STATES OF AMERICA,

V. 13-Mj65

MARK VALERIO,

<u>INFORMATION</u> (29 U.S.C. § 439(c))

Defendant.

## COUNT 1

## The United States Attorney Charges:

- 1. At all times relevant to this Information, the International Brotherhood of Electrical Workers, Local Union No. 249, and the International Brotherhood of Electrical Workers Union, System Council U-7 ("the unions") were labor organizations engaged in an industry affecting interstate and foreign commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, and were required to file annual financial reports with the U.S. Department of Labor.
- 2. Between in or about July of 2008 and in or about March of 2012, the exact dates being unknown, in the Western District of New York, the defendant, MARK VALERIO, knowing that he had an obligation to submit true and accurate documentation in regard to his expense records, recklessly disregarded that obligation in submitting records which were required to be kept pursuant to Title 29, United States Code, Section 436 as records associated with the reimbursement of Union funds, matters required to be reported on the annual financial reports of the unions which were required to be filed with the Secretary of Labor for such labor organizations.

## All in violation of Title 29, United States Code, Section 439(c).

Dated: Rochester, New York, September <u>18</u>, 2013

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